

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA,

Plaintiff,

v.

AKIL ERICKSON, MIKIEL ROBIN,
NYRON "Batt" ERICKSON and [REDACTED]

Defendants.

INDICTMENT

Criminal No. 2019-CR-53

Violations:

18 U.S.C. § 1956(h)

31 U.S.C. §§ 5332(a)(1) and
(b)(1) and (2)

18 U.S.C. § 1001(a)(2)

THE GRAND JURY CHARGES THAT:

COUNT ONE

International Money Laundering Conspiracy

18 U.S.C. § 1956(h)

On an unknown date and continuing through on or about October 8, 2018, at St. Thomas, District of the Virgin Islands, and elsewhere, the defendants,

Akil Erickson, Mikiel Robin, Nyron "Batt" Erickson and [REDACTED]

did conspire together and with others to knowingly transport funds and to engage in financial and monetary transactions in criminally derived property affecting interstate and foreign commerce, to wit, transporting funds from the British Virgin Islands to the United States, as known by the defendants, involved the proceeds of a specified unlawful activity, that is, dealing in controlled substances in violation of the laws of the United States with the intent to promote the carrying on of specified unlawful activity and with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, by concealing more than \$10,000 in currency on a person, or in any conveyance, article of luggage, merchandise, or other container, and transport or

USA v. Akil Erickson, et al.
Indictment
Page 2

transfer such currency from a place outside the United States, to a place within the United States,
in violation of 31 U.S.C. §§ 5332(a)(1);

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO
Bulk Cash Smuggling
31 U.S.C. §§ 5332(a)(1) and (b)(1) and (2)

On or about October 8, 2018, at St. Thomas, District of the Virgin Islands, the defendants,

Akil Erickson, Mikiel Robin, Nyron "Batt" Erickson and [REDACTED]

aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly,
with the intent to evade a currency reporting requirement under Title 31, United States Code,
Section 5316, conceal more than \$10,000 in currency on his person, or in any conveyance, article
of luggage, merchandise, or other container, and transport or transfer such currency from a place
outside the United States, to a place within the United States.

All in violation of Title 31, United States Code, Section 5332(a)(1) and Title 18,
United States Code, Section 2.

COUNT THREE
Bulk Cash Smuggling
31 U.S.C. §§ 5332(a)(1) and (b)(1) and (2)

On or about October 8, 2018, at St. Thomas, District of the Virgin Islands, the defendant,

Akil Erickson,

did knowingly, with the intent to evade a currency reporting requirement under Title 31, United
States Code, Section 5316, conceal more than \$10,000 in currency on his person, or in any

USA v. Akil Erickson, et al.
Indictment
Page 3

conveyance, article of luggage, merchandise, or other container, and transport or transfer such currency from a place outside the United States, to a place within the United States.

All in violation of Title 31, United States Code, Section 5332(a)(1).

COUNT FOUR
Bulk Cash Smuggling
31 U.S.C. §§ 5332(a)(1) and (b)(1) and (2)

On or about October 8, 2018, at St. Thomas, District of the Virgin Islands, the defendant,

Mikiel Robin,

did knowingly, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, conceal more than \$10,000 in currency on his person, or in any conveyance, article of luggage, merchandise, or other container, and transport or transfer such currency from a place outside the United States, to a place within the United States.

All in violation of Title 31, United States Code, Section 5332(a)(1).

COUNT FIVE
Bulk Cash Smuggling
31 U.S.C. §§ 5332(a)(1) and (b)(1) and (2)

On or about September 28, 2018, at St. Thomas, District of the Virgin Islands, the defendants,

[REDACTED] and Nyron Erickson

aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, conceal more than \$10,000 in currency on his person, or in any conveyance, article

of luggage, merchandise, or other container, and transport or transfer such currency from a place outside the United States, to a place within the United States.

All in violation of Title 31, United States Code, Section 5332(a)(1) and Title 18 United States Code, Section 2.

COUNT SIX

False Statements
18 U.S.C. § 1001(a)(2)

On or about October 8, 2018, at St. Thomas in the District of the Virgin Islands, in a matter within the jurisdiction of the United States Customs and Border Protection, Department of Homeland Security, an agency within the Executive Branch of the United States, the Defendant,

Mikiel Robin,

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation to United States Customs and Border Protection officers regarding a matter within the United States Department of Homeland Security's jurisdiction, that is, defendant falsely and fraudulently represented that he was not transporting in excess of \$10,000 from the British Virgin Islands to the United States.

In violation of Title 18, United States Code, Section 1001(a) (2).

COUNT SEVEN

False Statements
18 U.S.C. § 1001(a)(2)

On or about October 8, 2018, at St. Thomas in the District of the Virgin Islands, in a matter within the jurisdiction of the United States Customs and Border Protection, Department of Homeland Security, an agency within the Executive Branch of the United States, the Defendant,

USA v. Akil Erickson, et al.

Indictment

Page 5

Akil Erickson,

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation to United States Customs and Border Protection officers regarding a matter within the United States Department of Homeland Security's jurisdiction, that is, defendant falsely and fraudulently represented that he was not transporting in excess of \$10,000 from the British Virgin Islands to the United States.

In violation of Title 18, United States Code, Section 1001(a) (2).

FORFEITURE ALLEGATION

1) The allegations contained in Counts One through Six are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1), and Title 31, United States Code, Section 5332.

2) Pursuant to Title 18, United States Code, Section 982(a)(1), and Title 31 United States Code, Section 5332, upon conviction of any offenses in violation of Title 18, United States Code, Section 1956, or any offenses in violation of Title 31, United States Code, Section 5332, the defendant shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

(a) One hundred and thirty-eight thousand dollars (\$138,000.00) in United States currency.

(3) If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

USA v. Akil Erickson, et al.

Indictment

Page 6


- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

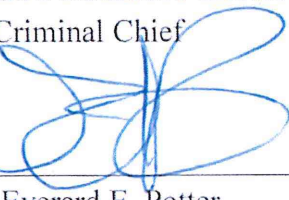
the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United

States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

USA v. Akil Erickson, et al.
Indictment
Page 7


GRETCHEN C.F. SHAPPERT
UNITED STATES ATTORNEY

By: 
G.A. Massucco-LaTaif
Criminal Chief

By: 
Everard E. Potter
Assistant United States Attorney

DISTRICT OF THE VIRGIN ISLANDS: August 1, 2019.

Returned into the District Court by Grand Jurors and filed.


CURTIS V. GOMEZ
UNITED STATES DISTRICT JUDGE